

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

“JESSICA ELAINE WOLFE©” on behalf of herself and all similarly situated INMATES OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS,

Plaintiff

V.

THE PENNSYLVANIA DEPARTMENT OF
CORRECTIONS, et al.

Defendants.

CIVIL CLASS ACTION No. 02-2687

**JOINT MOTION FOR AN EXTENSION OF TIME TO
COMPLETE DISCOVERY AND FILE DISPOSITIVE MOTIONS**

Plaintiff and Defendants, by and through their undersigned counsel, move the court for a 60-day extension of time to complete discovery and to file dispositive motions.

Although both counsel for Plaintiff and Defendants have worked diligently during the last two months to resolve document production issues, certain issues remain unresolved. Furthermore, both parties need to conduct depositions of relevant witnesses, after document production is complete. Counsel for Plaintiff anticipate that they will request additional documents and depositions after they complete the depositions of the Defendants.

In addition, Mary Catherine Roper, lead counsel for Plaintiff, is leaving the firm of Drinker Biddle and Reath LLP. Because of this transition, two new attorneys

will be added to Plaintiff's litigation team and will need additional time to familiarize themselves with the case.

Accordingly, the parties jointly move this Court for an Order approving an extension of time until April 4, 2005 to complete discovery and until April 18, 2005 to file dispositive motions.

A proposed form of Order is attached.

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“JESSICA ELAINE WOLFE©” on behalf of : CIVIL CLASS ACTION No. 02-2687
herself and all similarly situated INMATES OF :
THE PENNSYLVANIA DEPARTMENT OF :
CORRECTIONS, :
Plaintiff :
v. :
THE PENNSYLVANIA DEPARTMENT OF :
CORRECTIONS, et al. :
Defendants. :

AMENDED SCHEDULING ORDER

NOW, this ____ day of _____, 2005, upon consideration of the parties' Joint Motion for an Extension of Time to Complete Discovery and File Dispositive Motions, **IT IS HEREBY ORDERED** that the Court's Scheduling Order of November 2, 2004 is amended as follows:

1. All discovery shall be completed by April 4, 2005.
2. Any motions for summary judgment or other dispositive motions shall be filed by April 18, 2005.
3. The submissions identified in paragraph 3 of the Court's Order of November 2, 2004 shall be made by April 25, 2005.
4. The case shall be placed in the trial pool on or after May 2, 2005.

In all other respects, the Court's Order of November 2, 2004 shall remain in effect.

By the Court:

EDUARDO C. ROBRENO, J.